CASE NO. 4:23-CV-05034-JST

Document 45

Filed 10/02/25

Page 1 of 3

Case 4:24-cv-07877-JST

discovery responses between themselves and without need for judicial intervention;

WHEREAS, the Parties are continuing to meet and confer with respect to potential discovery dispute disputes;

WHEREAS, the Parties agree that efficiency dictates the proposed deadlines in the abovecaptioned matter to afford the Parties additional time to work towards a resolution of this dispute;

WHEREAS, subject to Court approval, Parties stipulate to the below revised schedule:

		D 1D 111
Event	Current Deadline	Proposed Deadline
Expert Disclosures	September 17, 2025	November 19, 2025
Expert Rebuttal	October 20, 2025	December 22, 2025
Discovery cut-off	November 13, 2025	January 15, 2026
Mediation Deadline	November 17, 2025	January 19, 2026
Last day to file dispositive motions	January 29, 2026	April 2, 2026
Last day to file oppositions to	February 26, 2026	April 30, 2026
dispositive motions		
Last day to file replies to dispositive	April 2, 2026	June 4, 2026
motions		
Dispositive motion hearing	April 23, 2026 at 2:00PM	June 25, 2026
Last day to file motion for class	May 28, 2026	July 30, 2026
certification		
Last day to file opposition to class	To be set	September 3, 2026
certification		
Last day to file reply in further support	To be set	October 1, 2026
of class certification		

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

Dated: October 1, 2025

1 2 /s/ Andrew R. Perrong /s/ Glenn T. Graham Andrew R. Perrong (pro hac vice) Lauri A. Mazzuchetti (pro hac vice) 3 **Perrong Law LLC** Glenn T. Graham (SBN #338995) 2657 Mount Carmel Avenue Kelley Drye & Warren LLP 4 7 Giralda Farms, Suite 340 Glenside, PA 19038 Madison, New Jersey 07940 5 Telephone: (215) 225-5529 (CALL-LAW) Facsimile: (888) 329-0305 Telephone: (973) 503-5900 6 Facsimile: (973) 503-5950 a@perronglaw.com lmazzuchetti@kelleydrye.com 7 ggraham@kelleydyre.com Dana J. Oliver (SBN #291082) 8 Oliver Law Center, Inc. Counsel for Defendant, Sunrun Inc. 8780 19th Street, #559 9 Rancho Cucamonga, CA 91701 10 Tel: (855) 384-3262 Facsimile: (888) 570-2021 11 Counsel for Plaintiff Peggy Banks 12 **ATTESTATION OF FILER** 13 Pursuant to Civil L.R. 5-1(i)(3), the undersigned filer hereby attests that all signatories 14 listed, and on whose behalf the filing is submitted, concur in the filing's content and have 15 authorized the filing. 16 /s/ Glenn T. Graham Dated: October 1, 2025 17 Glenn T. Graham 18 PURSUANT TO STIPULATION, IT IS SO ORDERED 19 20 Dated: October 2, 2025 21 on S. Tigar, USDJ 22 23 24 25 26 27 28